

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS; *et al.*,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House
Standing Committee on Redistricting; *et al.*,

Defendants.

Civil Action No. 23-CV-1057

NORTH CAROLINA STATE
CONFERENCE OF THE NAACP; *et al.*,

Plaintiffs,

v.

PHILIP BERGER, in his official capacity as
the President Pro Tempore of the North
Carolina Senate; *et al.*,

Defendants.

Civil Action No. 23-CV-1104

**LEGISLATIVE DEFENDANTS' RULE 26(1)(a)(3)(A) PRETRIAL
DISCLOSURES**

Legislative Defendants, pursuant to Fed. R. Civ. P. 26(a)(3)(A), provide the following pretrial disclosures for the trial set to begin in the above-captioned matters on June 16, 2025:

I. WITNESSES LEGISLATIVE DEFENDANTS EXPECT OR MAY PRESENT AT TRIAL

Pursuant to Fed. R. Civ. P. 26(1)(a)(3)(A)(i), Legislative Defendants expect to present the following witnesses at trial:¹

1. Senator Ralph E. Hise, Jr.
2. Dr. John Alford
3. Dr. Michael Barber
4. Dr. M.V. Hood III
5. Dr. Andrew Taylor
6. Dr. Sean Trende

Pursuant to Fed. R. Civ. P. 26(1)(a)(3)(A)(i), Legislative Defendants may call the following witnesses:

1. Blake Springhetti¹
2. Representative Pricey Harrison
16 W. Jones Street
Room 1218
Raleigh, NC 27601
3. Senator Kandie Smith
16 W. Jones Street
Room 1113
Raleigh, NC 27601
4. Stephen Mallinson
455 Plainview Avenue
Raleigh, NC 27604

¹ All of these witnesses can be contacted through counsel for Legislative Defendants.

II. WITNESSES WHO LEGISLATIVE DEFENDANTS MAY PRESENT BY DEPOSITION

Legislative Defendants do not intend to present any witnesses by deposition at this time. However, pursuant to the agreement between the parties, Legislative Defendants reserve the right to submit deposition testimony in lieu of live testimony for any witness who becomes unavailable.

III. EXHIBITS THAT DEFENDANTS EXPECT OR MAY OFFER AT TRIAL

Legislative Defendants refer Plaintiffs' to the Exhibit List served contemporaneously with these disclosures. Legislative Defendants expect to use all of the listed expert materials, and may use the remaining listed materials.

Submitted this the 16th day of May, 2025.

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Counsel for Legislative Defendants
* Appeared via Special Notice

CERTIFICATE OF SERVICE

I, Cassie A. Holt, hereby certify that I have emailed the foregoing document on all counsel of record in this action.

This the 16th day of May 2025.

**NELSON MULLINS RILEY &
SCARBOROUGH LLP**

/s/ Cassie. A. Holt

Cassie A. Holt
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